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VIA E-MAIL
caroline.thomasjacobs@cpuc.ca.gov

Ms. Caroline Thomas Jacobs
Director, Wildfire Safety Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Re: Pacific Gas and Electric Company's Comments on WSD's Draft Safety Culture
Assessment Requirements

Dear Ms. Thomas Jacobs:

Pacific Gas and Electric Company ("PG&E") respectfully submits these comments on the Draft Safety Culture Assessment ("SCA") Requirements issued by the Wildfire Safety Division ("WSD") on December 3, 2020.

PG&E recognizes and appreciates the tremendous work that went into developing the Draft SCA Requirements, and believes that WSD's safety culture assessments will be an important part of PG&E's efforts to improve its safety culture and performance. PG&E looks forward to working with WSD to further this critical goal. PG&E submits these comments to address three issues: (i) the optimal cadence for the workforce survey component of WSD's assessments; (ii) the appropriate third-party administrator for the survey; and (iii) the content of the utility self-assessment, and PG&E's engagement with WSD on this issue and related issues.

Optimal Cadence for the Workforce Survey

Although Assembly Bill 1054 contemplates annual safety culture assessments,¹ it does not require WSD to conduct every component of those assessments on an annual basis. For several related reasons, PG&E believes that biennial workforce surveys would be optimal, and that more frequent surveys could be counterproductive to the shared goal of improving safety.

First, biennial surveys are better suited to allowing electrical utilities to undertake actions in response to survey results, and to enabling the utilities and WSD to measure and assess progress. Surveys take time to administer. Once they are administered, the results must be analyzed, conclusions must be drawn, and if appropriate, changes must be implemented and

¹ See Pub. Util. Code § 8389(d)(4).

progress tracked. If the survey is administered annually, there may be insufficient time to accomplish all of this and to actually see progress manifested in changed employee perceptions; this is particularly true with respect to safety culture because “[s]afety culture is a stable and enduring feature of the organisation,” and as such, can take considerable time and effort to change.² Administering surveys too frequently could lead to ambiguous conclusions, resulting in misdirected safety initiatives and misallocations of resources. Administering surveys too closely together also could cause workers to view them as redundant or otherwise not meaningful, resulting in a lower response rate and therefore less reliable data.

Second, layering on too many initiatives at once can be confusing and counterproductive. PG&E is implementing and responding to a myriad of initiatives that are designed to improve its safety culture and performance. For example, PG&E conducts its own safety culture surveys, as contemplated by the Draft SCA Requirements.³ PG&E also periodically responds to “the Commission’s broader safety culture assessment[s] required by Public Utilities Code §8386.2.”⁴ PG&E also provides detailed information in response to safety culture monitoring by NorthStar Consulting Group (“NorthStar”), and utilizes a recently established Independent Safety Oversight Council to conduct field visits, interviews, and observations as necessary to evaluate PG&E’s wildfire and other safety operations. PG&E’s employee and contractor workforce is at the forefront of many of these efforts, and adding another survey every year could lead to frustration, and a mistaken perception that the survey is unimportant in the overall structure of safety initiatives. That, in turn, could result in a lower response rate, reducing the usefulness of the survey.

Third, engaging frontline workers to complete surveys can present unique challenges arising from the nature of work in the field. It also can be challenging for other reasons; for example, PG&E lacks direct control over the sub-contractor workforce. Particularly given the other factors discussed above, it would seem prudent to deploy the resources necessary to overcome these challenges biennially instead of annually.

For the foregoing reasons, PG&E recommends that WSD conduct the workforce survey component of its safety culture assessments on a biennial basis. Specifically, PG&E proposes that WSD conduct its full safety culture assessment (including the workforce survey) in year one in order to establish a safety culture baseline. PG&E proposes that, thereafter, the workforce survey be administered only in years three, five, and so on.

Third-Party Administrator for the Workforce Survey

PG&E proposes that the third-party administrator of the survey be the National Safety Council (“NSC”). Two of California’s investor-owned utilities utilize the NSC Barometer safety survey. NSC has over 30 years of experience in the development and execution of employee safety perception surveys in a variety of occupational settings. The NSC Safety Barometer is a valid and reliable survey instrument empowering employees to evaluate their organizations’ safety and health. NSC researchers have compiled the results of surveying organizations in a

² R. Kenney & B. Kirwan, *Development of a Hazard and Operability-Based Method for Identifying Safety Management Vulnerabilities in High Risk Systems*, 30 *Safety Science* 249, 250 (1988).

³ See Draft SCA Requirements at 3 (“[E]ach electrical corporation may conduct its own internal safety culture assessment survey in addition to the WSD’s assessment.”).

⁴ *Id.*

proprietary database that enables organizations to compare responses of their employees with up to 1400 other businesses, including approximately 175 utility businesses⁵, representing more than 2 million employee responses. Benchmarked results are presented in percentile score format, further enabling organizations to view meaningful strengths and gaps affecting their safety performance, by putting results in the context of other organizations and removing noise from the survey data. PG&E believes that NSC would be a prudent choice for administering the survey.

Content of the Utility Self-Assessment, and Related Engagement with WSD

PG&E has some concerns with the proposed content of the utility self-assessment, although PG&E does not offer detailed suggestions here. In particular, PG&E is concerned that, in many instances, the assessment does not allow for objective, specific ratings, but instead leaves it up to the organization to rate itself based on undefined and therefore subjective concepts such as “rigorous,” “regularly,” “effective,” and “caring.”⁶ PG&E would like to work with WSD on ensuring that the assessment is as objective and meaningful as possible, so that the results can be appropriately benchmarked and compared across utilities.

Relatedly, PG&E would like the opportunity to engage with WSD regarding how WSD’s annual safety culture assessments will be used for regulatory purposes. For example, PG&E would appreciate guidance on whether WSD believes that WSD’s annual assessment, or instead another assessment, is the pertinent “safety culture assessment” for purposes of Public Utilities Code § 8389(e)(2) and the annual safety certification process. PG&E also would like to ensure that WSD receives a holistic picture of PG&E’s efforts to improve its safety culture, including information from PG&E’s own safety culture assessments, the Commission’s periodic safety culture assessments, and NorthStar’s ongoing monitoring.

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PG&E thanks WSD for its consideration of these comments, and looks forward to continued collaboration with WSD going forward.

Sincerely,

/s/ Diane Thurman

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cc: R.18-10-007 Service List

⁵ Utilities (NAICS 22) businesses.

⁶ Draft SCA Requirements at 14-15, 23, 27-28.